

IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

Plaintiff,

v.

CIVIL NO. _____

133 ACRES OF LAND, MORE OR LESS,
SITUATE IN DORCHESTER COUNTY,
MARYLAND,

UNKNOWN HEIRS OF ELMER HANCOCK,

JUDITH PERRINE
20 Sassman Lane
Kingston, NJ 08528,

DAVID PERRINE
25 Rutledge Ave.
Ewing, NJ 08618,

ROBERT C. PERRINE, SR.
3416 Palestine Rd.
Huntington, AR 72940,

JAMES C. PERRINE
306 White Pines Cir.
Lawrenceville, NJ 08648,

DEBORAH HANCOCK
648 Old York Rd.
East Windsor, NJ 08520-2916,

VICTORIA S. GEORGIC
4112 Loring St.
Butler, PA 16001-2988,

RUTH VIRGINIA HANCOCK-STEFAN
852 Williams St.
Emmaus, PA 18049-2838,

SARAH JEAN HANCOCK HUTCHINSON)
204 Greeley Street)
Hightstown, NJ 08520,)
)
ANN ELAINE HANCOCK VALLASTER)
12 Bradford Road)
Hightstown, NJ 08520,)
)
MARYJEAN HANCOCK)
860 Wright Debow Rd.)
Jackson, NJ 08527,)
)
GALE MILLER)
Address Unknown,)
)
CONSTANCE MILLER)
Address Unknown,)
)
MARK L. RANIERE)
433 Chester St. SE)
Marietta, GA 30060,)
)
PAUL DOUGLAS RANIERE)
3637 Sunset Ridge)
Powder Springs, GA 30127,)
)
EARL GROENDYKE)
881 Windsor Perrineville Rd.)
East Windsor, NJ 08520,)
)
BRUCE GROENDYKE)
144 Center St.)
Hightstown, NJ 08520,)
)
GARY GROENDYKE)
528 Stagecoach Rd.)
Millstone Township, NJ 08510,)
)
ROBERT HANCOCK)
14 Center St.)
Neptune, NJ 07753,)
)
DENISE L. HOY)
75 Tavitian Blvd.)
Marlborough, MA 01752,)

GRAY WILLIAMS)
7808 Hillock Ter.)
Austin, TX 78744,)
)
JOAN CONOVER)
The Lodge at Old Trail)
Seasons Memory Care Rm. 99)
330 Claremont Ln.)
Crozet, VA 22932,)
)
CHARLOTTE CONOVER)
1623 Pennecamp Drive)
The Villages, FL 32162-3212,)
)
BARBARA SCHUYLER)
Address Unknown,)
)
DORCHESTER COUNTY, TREASURY OFFICE)
c/o Michael J. Spears, Director of Finance and)
Collector of Taxes)
501 Court Lane, Room 102)
Cambridge, Maryland 21613)
)
)
)
Defendants.)
_____)

COMPLAINT IN CONDEMNATION

1. This is a civil action brought by the United States of America, at the request of the U.S. Department of the Interior (“Interior”), for the taking of land in Dorchester County, Maryland, under its power of eminent domain and through a Declaration of Taking, and for the determination and award of just compensation to the owners and parties in interest.

2. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1358. Venue is proper under 28 U.S.C. § 1403.

3. The authority for the acquisition is set forth in Schedule A, which is attached hereto and made a part hereof.

4. The public purpose for which the land is taken is set forth in Schedule B, which is attached hereto and made a part hereof.

5. A legal description of the land taken is set forth in Schedule C, which is attached hereto and made a part hereof.

6. A plat (map) showing the land taken is set forth in Schedule D, which is attached hereto and made a part hereof.

7. The estate taken in the land is described in Schedule E, which is attached hereto and made a part hereof.

8. The estimate of just compensation is stated in Schedule F, which is attached hereto and made a part hereof.

9. The names and addresses of known parties having or claiming an interest in said land are set forth in Schedule G, which is attached hereto and made a part hereof.

WHEREFORE, Plaintiff United States of America requests judgment that the property and interests be condemned, that just compensation for the taking be ascertained and awarded, and the Court award such other relief as may be lawful and proper.

DATED: February 18, 2022

Respectfully submitted,

TODD KIM
ASSISTANT ATTORNEY GENERAL
ENVIRONMENT AND NATURAL RESOURCES
DIVISION

EREK L. BARRON
UNITED STATES ATTORNEY

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